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INTERVENTION

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Writer's direct dial number:

Reply to Washington, D.C. office

December 23, 1997

VIA FEDERAL EXPRESS

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Re: Docket No. U-0000-94-165

Dear Docket Control:

Enclosed for filing is an original and eleven (11) copies of the Late Petition to Intervene of the Center for Energy and Economic Development (CEED).

We have enclosed an additional copy to be stamped "filed" and returned to us in the self-addressed stamped envelope we have provided.

Thank you.

Sincerely,

Daneé Gaines
Law Clerk

cc: Service list

Arizona Corporation Commission
DOCKETED

DEC 24 1997

DOCKETED BY	
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**STATE OF ARIZONA
ARIZONA CORPORATION COMMISSION**

**IN THE MATTER OF THE)
COMPETITION IN THE PROVISION)
OF ELECTRIC SERVICES)
THROUGHOUT THE STATE OF)
ARIZONA)**

DOCKET NO. U-0000-94-165

DOCUMENT CONTROL

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AZ CORP COMMISSION

**LATE PETITION TO INTERVENE OF THE
CENTER FOR ENERGY AND ECONOMIC DEVELOPMENT**

The Center for Energy and Economic Development (CEED) submits this Late Petition to Intervene in the above-referenced docket, and in support thereof states as follows:

1. CEED is a non-profit organization formed by the nation's railroads, coal producing companies, a number of electric utilities and related organizations for the purpose of participating in state and regional regulatory proceedings affecting the utilization of coal by electric utilities. CEED's members include coal producing companies that sell coal to Arizona electric utilities and railroads that transport that coal.
2. CEED has an interest in this proceeding because its members supply and transport coal for electric generation in Arizona. CEED wishes to participate in this proceeding because this proceeding potentially affects the type of fuel that will be used for generation in Arizona.
3. CEED is filing this petition late because it was, until today, unaware of the Commission's August 29, 1997 order reopening the docket and has not yet received a copy of that order. Considering no action has been taken since reopening this docket, CEED's late filing should not result in prejudice to any party. CEED therefore requests that its late petition be granted for good cause shown.

4. Service of pleadings, correspondence and other documents in this docket should be made upon the following persons:

Terry Ross
Vice-President
Center for Energy and
Economic Development
P.O. Box 288
Franktown, CO 80116

Peter Glaser
Doherty Rumble & Butler, P.A.
1401 New York Avenue, N.W.
Suite 1100
Washington, D.C. 20005

Dated: December 23, 1997

Respectfully submitted,



Peter Glaser
Doherty, Rumble & Butler, P.A.
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(202) 393-2554

Attorney for the Center for Energy
And Economic Development

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing LATE PETITION TO INTERVENE OF THE CENTER FOR ENERGY AND ECONOMIC DEVELOPMENT was mailed, via first-class mail, this 23rd day of December, 1997 to each person on the attached service list.



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Benson, AZ 85602

Columbus Electric Coop. Inc.
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Deming, NM 88031

Dixies Escalante Rural
Electric Assoc.
CR Box 95
Beryl, UT 84714

Garkane Power Association, Inc.
P.O. Box 790
Richfield, UT 84701

Mohave Electric Cooperative Inc.
P.O. Box 1045
Bullhead City, AZ 86430

Navopache Electric Coop. Inc.
P.O. Box 308
Lakeside, AZ 85929

Trico Electric Cooperative, Inc.
P.O. Box 35970
Tucson, AZ 85740

Continental Divide Electric
Cooperative
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Grants, NM 87020

Duncan Valley Electric Coop. Inc.
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Graham County Electric
Cooperative, Inc.
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Pima, AZ 85543

Morenci Water and Electric
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Morenci, AZ 85540

Sulphur Springs Valley Electric
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